

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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**MILTON ESPADA, ARTHUR KILL PROPERTIES,
LLC, and PLAZA BODY SHOP, INC.**

Case No.: 23-cv-6186 (NRM)(JRC)

Plaintiffs,

- against -

**CITY OF NEW YORK, NEW YORK POLICE
DEPARTMENT CAPTAIN GLORISEL LEE, NEW
YORK POLICE DEPARTMENT LIEUTENANT
MIGUEL ESTEVEZ, BREEN BROS. TOWING,
INC., JOSEPH BREEN, and DEALER DIRECT
SERVICES, INC.**

Defendants.

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NOTICE OF MOTION FOR DEFAULT JUDGMENT

TO: Dealer Direct Services, Inc.
335 Chelsea Road
Staten Island, New York 10314

&

Dealer Direct Services, Inc.
4300 Arthur Kil Road
Staten Island, New York 10309

PLEASE TAKE NOTICE that the undersigned will make application to this Court, before the Honorable James R. Cho, U.S.M.J., at the United States Courthouse, 225 Cadman Plaza East, Brooklyn, New York 11201, on a date and time to be set by the Court, for entry of a default judgment in favor of Plaintiff Arthur Kill Properties, LLC and against Defendant Dealer Direct Services, Inc.

Dated: Lake Success, New York
April 11, 2025

MILMAN LABUDA LAW GROUP PLLC

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